



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

November 12, 2021

BY ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Kathleen M. McKenna
Member of the Firm
d +1.212.969.3130
f 212.969.2900
kmckenna@proskauer.com
www.proskauer.com

Re: *Jennifer Eckhart v Fox News Network, LLC and Ed Henry*, Civil Case No. 1:20-cv-05593

Dear Judge Gorenstein:

We represent Defendant Fox News Network, LLC (“Fox”), and write jointly with counsel for Plaintiff and counsel for Defendant Ed Henry (collectively, “Parties”) to respectfully request that the deadline for the Parties to submit their Proposed Confidentiality Stipulation and Order be extended one business day, up to and including Monday, November 15, 2021.

The Parties have been negotiating in good faith and have been able to resolve nearly all of the disputes between them at this time. Given this significant progress, we believe that this brief extension will allow the Parties to address the remaining aspects of the proposed order.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Kathleen M. McKenna

Kathleen M. McKenna, Esq.

cc: All counsel of record (via ECF)